

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

PARK HUNG QUAN,

Defendant.

NO. CR19-0148JCC

NOTICE OF RELATED
CASES

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAIGE A. THOMPSON,

Defendant.

NO. CR19-0159RSL

NOTICE OF RELATED
CASES

The United States of America, by and through Brian T. Moran, United States Attorney for the Western District of Washington, and Andrew C. Friedman and Steven T. Masada, Assistant United States Attorneys for said District, submits the following notice

1 advising the Court that the above-captioned cases, *United States v. Park Hung Quan*,
2 CR19-0148JCC, and *United States v. Paige A. Thompson*, CR19-0159RSL, are related cases.

3 **FACTS**

4 On July 26, 2019, the Federal Bureau of Investigation (FBI), which was conducting
5 an investigation into a breach of servers rented by Capital One Financial Corporation
6 (“Capital One”) from a cloud computing company, and the theft of information from those
7 servers, obtained a search warrant to search the residence of Paige A. Thompson for
8 evidence relating to that crime. Thompson was a tenant in a residence owned, and also lived
9 in, by Park Hung Quan, and also lived in by three other people. On July 29, 2019, the FBI
10 executed that search warrant. Thompson, Quan, and their three housemates all were present
11 at the residence.

12 While conducting an initial security sweep of the residence, agents observed firearms
13 and firearms-related items in Quan’s bedroom. Quan, who is a convicted felon, is not
14 allowed to possess firearms. Agents halted their search of Quan’s bedroom and obtained a
15 supplemental warrant authorizing a search for firearms and related items. Pursuant to the
16 two warrants, agents seized evidence relating to the cyber intrusion from Thompson’s
17 bedroom, and they seized firearms and firearms-related items from Quan’s bedroom. Based
18 upon those seizures, and other evidence in the investigations, Quan was indicted on
19 August 8, 2019, in *United States v. Park Hung Quan*, CR19-0148JCC, for being a felon in
20 possession of a firearm. Thompson was indicted on August 28, 2019, in *United States v.*
21 *Paige A. Thompson*, CR19-0159RSL, for wire fraud and computer fraud and abuse.

22 **DISCUSSION**

23 The two cases, *United States v. Park Hung Quan*, CR19-148JCC, and *United States v.*
24 *Paige A. Thompson*, CR19-159RSL, share common questions of law and fact. Pursuant to
25 Local Criminal Rule 13, when cases involve common questions of law or fact, it may be
26 appropriate that the cases be assigned to the judge to whom the case bearing the earliest
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1 filing number was assigned. *See* CrR 13(a). “Counsel are encouraged to file a notice of
2 related case in order to bring such cases to the attention of the court.” CrR 13(b).

3 As discussed above, *United States v. Park Hung Quan*, CR19-148JCC, and *United*
4 *States v. Paige A. Thompson*, CR19-159RSL, arise out searches of the same residence.
5 Either, or both, may involve challenges to the initial warrant to search the residence for
6 evidence of Thompson’s cybercrime. Thus, they may present the same legal issues. And,
7 any challenge to the search warrants at issue in either case would involve testimony from the
8 same witnesses: that is, the searching agents and the residents of the house.

9 More generally, Quan and Thompson are witnesses to each other’s crimes.
10 Thompson presumably witnessed Quan’s ownership and possession of firearms. (Other
11 housemates certainly did.) And Quan presumably has knowledge of who had access to
12 Thompson’s computers. Quan and Thompson also could be suspects to whom their counsel
13 would point as alternative perpetrators of their crimes. For instance, Thompson might
14 suggest that Quan, who apparently had access to her computer, was the person who actually
15 was responsible for committing intrusions with which she is charged. Moreover, the two
16 cases are to some extent intertwined: for example, Thompson’s access to Quan’s firearms
17 was a factor at Thompson’s detention hearing.

18 Finally, Thompson’s and Quan’s housemates are material witnesses in both criminal
19 cases. Notably, multiple housemates have made public statements to the media about the
20 search and about both Quan and Thompson.¹ And, housemates have provided conflicting
21 statements in the two proceedings. For example, one housemate supported Quan’s release
22 by telling the United States Probation & Pretrial Services Office that Thompson would not
23 be welcome back at the house, but subsequently supported Thompson’s release by saying
24 that Thompson was welcome to return to the house.

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27 ¹ *See, e.g.*, <https://www.seattletimes.com/seattle-news/crime/seattle-woman-accused-in-massive-capital-one-data-breach-was-skilled-with-computers-but-struggled-in-her-personal-life/> (Aug. 1, 2019);
28 <https://www.dailymail.co.uk/video/news/video-1977172/Roommate-Capital-One-hacker-Paige-Thompson-speaks-raid.html> (Aug. 1, 2019); <https://www.king5.com/article/news/local/she-couldve-gotten-us-killed-seattle-roommates-describe-fbi-raid-of-capital-one-hacking-suspect/281-d2c4c1c3-6250-4e1c-89d2-a61fa7c0343a> (July 31, 2019).

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s).

s/ Andrew C. Friedman

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